



# Conservation Law Foundation

April 26, 2004

**BY HAND**

Mary L. Cottrell, Secretary  
Department of Telecommunications and Energy  
One South Station, 2<sup>nd</sup> Floor  
Boston, MA 02110

RE: D.T.E. 03-121; First Set of Information Requests of CLF to SEBANE

Dear Secretary Cottrell:

Enclosed please find for filing the First Set of Information Requests of Conservation Law Foundation ("CLF") to NSTAR Electric. This filing is made today pursuant to the Hearing Officers order of April 22, 2004, permitting information requests to be filed today based on NSTAR Electric testimony filed the previous day on April 21, 2004.

CLF received NSTAR Electric's rebuttal testimony from three witnesses, which included two new witnesses and a entirely new tariff filed by the witness who sponsored NSTAR Electric's initial direct testimony, three business days ago on the afternoon of April 21. Two business days ago, on Thursday, April 22, the Hearing Officer informed the parties that discovery on the rebuttal testimony including NSTAR Electric's revised case, would be due in two business days by close of business on Monday, April 26, 2004. It is not possible for CLF to adequately review and analyze NSTAR Electric's rebuttal testimony and new tariff and to prepare its complete discovery within the two business days granted to it under the current schedule. CLF respectfully reserves the right to issue further discovery as it continues to examine NSTAR Electric's rebuttal testimony and revised case.

Thank you for your cooperation.

Sincerely yours,

Seth Kaplan

cc: Service List

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